

Federal Defenders  
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April 30, 2024

**By ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *United States v. Armando Kenneth Beniquez*, 23 Cr. 544 (VEC)**

Dear Judge Caproni:

I write with the consent of the Government and counsel for co-defendant Donte Goulbourne to request a modification to the current deadlines for motions *in limine*. The current schedule requires the parties to file motions *in limine* on June 14, 2024, the same day that the Court has blocked out for a hearing on the defendants' forthcoming suppression motion. I therefore request that the deadline for motions *in limine* be adjourned by two weeks, from June 14, 2024 to June 28, 2024, and that the deadline for responses be adjourned from June 28, 2024 to July 12, 2024. This adjournment would free the parties from having to focus simultaneously on preparations for a suppression hearing and on filing motions. Moreover, the adjournment might enable the parties to address motions *in limine* with the benefit of a ruling on the defendants' suppression motion.

As noted, the Government and counsel for Donte Goulbourne consent to this application. Thank you for considering it.

Respectfully submitted,



Ariel Werner  
Assistant Federal Defender  
917-751-2050

cc: counsel of record

Application GRANTED. The deadline for the parties to file motions *in limine* is extended from Friday, June 14, 2024, to **Friday, June 28, 2024**. The deadline to file responses to motions *in limine* is extended from Friday, June 28, 2024, to **Friday, July 12, 2024**.

SO ORDERED.



5/1/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE